

1 Michael J. Wynne (Pro Hac Vice)
2 Texas State Bar No. 00785289
3 Hughes Arrell Kinchen, LLP
4 1221 McKinney St. | Suite 3150
5 Houston, Texas 77010
6 Telephone: (713) 574-6514
7 Facsimile: (713) 942-2266
8 E-mail: mwynne@hakllp.com
9 **ATTORNEY FOR DEFENDANT**
10 **JOSÉ SUSUMO AZANO MATSURA**

11 Donald J. DeGabrielle (Pro Hac Vice)
12 Texas State Bar No. 24063659
13 CHAFFE McCALL, L.L.P.
14 801 Travis Street | Suite 1910
15 Houston, Texas 77002
16 Telephone: (713) 546-9800
17 Facsimile: (713) 546-9806
18 E-mail: degabrielle@chaffe.com
19 **ATTORNEY FOR DEFENDANT**
20 **EDWARD SUSUMO AZANO HESTER**

21
22
23
24
25
26
27
28
**THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA
SAN DIEGO**

UNITED STATES OF AMERICA,)	Criminal No. 14-CR-388-MMA
)	
Plaintiff,)	STATEMENT OF FACTS AND
)	MEMORANDUM OF AUTHORITIES
)	IN SUPPORT OF MOTION IN LIMINE
)	
JOSÉ SUSUMO AZANO MATSURA, et al)	
)	
Defendants.)	
)	

23 José Susumo Azano Matsura, through his attorney, Michael J. Wynne, and Edward Susumo
24 Azano Hester, through his attorney, Donald J. DeGabrielle, state the following in support of their
25 Motion in Limine:

26 Granting the motion as to each item identified will reduce the chance that irrelevant material
27 will be presented to the jury for consideration and will reduce the chance that inflammatory
28

1 allegations and statements, photographs, or other items, more prejudicial than probative of any
2 element of the charged offenses will be presented to the jury. Granting the motion will also limit
3 the likelihood that the government will try the Defendants' by ambush.

4 Granting the motion will assist the Court in making timely pre-trial determinations of
5 admissibility and in avoiding confusion of the issues and misleading the jury. Finally, granting the
6 motion will tend to minimize undue delay, waste of time, and the needless presentations of
7 cumulative evidence.
8

9
10 Respectfully submitted,

11
12 /s/ Michael J. Wynne
Michael J. Wynne*
13 Texas State Bar No. 00785289
Hughes Arrell Kinchen, LLP
14 1221 McKinney St. | Suite 3150
Houston, Texas 77010
15 Telephone: (713) 574-6514
16 Facsimile: (713) 942-2266
E-mail: mwynne@hakllp.com
17 **ATTORNEY FOR DEFENDANT**
JOSÉ SUSUMO AZANO MATSURA

18
19 /s/ Donald J. DeGabrielle
Donald J. DeGabrielle*
20 Texas State Bar No. 24063659
CHAFFE McCALL, L.L.P.
21 801 Travis Street | Suite 1910
Houston, Texas 77002
22 Telephone: (713) 546-9800
23 Facsimile: (713) 546-9806
E-mail: degabrielle@chaffe.com
24 **ATTORNEY FOR DEFENDANT**
EDWARD SUSUMO AZANO HESTER

25
26
27 **admitted Pro Hac Vice*
28

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of June, 2016, a true and correct copy of the above and foregoing has been forwarded to all counsel record by notice of ECF filing.

/s/ Michael J. Wynne
Michael J. Wynne

**admitted Pro Hac Vice*

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28